

**FILED**  
 US DISTRICT COURT  
 WESTERN DISTRICT  
 OF ARKANSAS  
 Jun 4, 2019  
 OFFICE OF THE CLERK

# UNITED STATES DISTRICT COURT

for the  
 Western District of Arkansas

In the Matter of the Search of

Google Email Account(s)  
 420hippie8@gmail.com that is  
 controlled by Google, Inc.

Case No. 19 cm 70

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

SEE ATTACHMENT "A", This court has authority to issue this warrant under 18 U.S.C. §§ 2703(c)(1)(A) and 2711(3) (A) and Federal Rule of Criminal Procedure 41

located in the \_\_\_\_\_ District of \_\_\_\_\_, there is now concealed *(identify the person or describe the property to be seized)*:

SEE ATTACHMENT "B"

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section*

*Offense Description*

18 USC 2252/2252A

Distribution and possession of Child Pornography

The application is based on these facts:

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

*Applicant's signature*

Homeland Security TFO Kevin Sears

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

6/4/19

*Judge's signature*

City and state: Fayetteville, Arkansas

Erin L. Wiedemann, U.S. Magistrate Judge

*Printed name and title*

**ATTACHMENT C**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF ARKANSAS**

IN THE MATTER OF THE SEARCH OF  
INFORMATION ASSOCIATED WITH  
GOOGLE EMAIL ACCOUNT:  
420hippie8@gmail.com  
THAT IS STORED AT PREMISES  
CONTROLLED BY GOOGLE, INC.

Case No. 19 cm 70

**Filed Under Seal**

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, KEVIN SEARS, a Task Force Officer with Homeland Security Investigations (HSI),  
being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Task Force Officer with the Department of Homeland Security, Homeland Security Investigations ("HSI"), currently assigned to the Assistant Special Agent in Charge Office in Fayetteville, Arkansas. I have been so employed with Washington County Sheriff's Office since January, 2007. As part of my daily duties as a Task Force Officer with HSI, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, online enticement, transportation, receipt and possession of child pornography, in violation of Title 18 U.S.C. §§ 2251, 2251A, 2422(b), 2252(a) and 2252A. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in Title 18 U.S.C. § 2256) in all forms of media including computer media. I have also participated in the execution of numerous search warrants and arrest

warrants, a number of which involved child exploitation and/or child pornography offenses. This affidavit is being submitted based on information from my own investigative efforts as well as information obtained from others who have investigated this matter and/or have personal knowledge of the facts herein.

2. I make this affidavit in support of an application for a search warrant for information related to Google email account: 420hippie8@gmail.com account that are stored at the premises controlled by Google, Inc. (Google, Inc.), an electronic mail/Internet service provider, file storage and synchronization service provider headquartered at 1600 Amphitheatre Parkway, Mountain View, California 74043. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under Title 18 U.S.C. § 2252A, relating to possession, distribution and production of images/videos of child pornography; to require Google Inc. to disclose to the government records and other information in its possession pertaining to the subscriber or customer associated with the Google Hangouts user accounts of 420hippie8@gmail.com, Happy Hippie, and Phillip Shoup.

3. This affidavit is made in support of an application for a search warrant under Title 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Google, Inc. to disclose to the government the requested records and other information in its possession. As such, your Affiant is requesting authority to search the social media accounts where the items specified in Attachment A may be found, and to seize all items listed in Attachment B as instrumentalities, fruits, and evidence of crime.

4. This Affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.



5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that evidence constituting violations of Title 18 U.S.C. §§ 2252, 2252A, “Possession of Child Pornography” and “Access with Intent to View Child Pornography,” are currently present on the item described as Attachment A.

6. There is also probable cause to search the information described in Attachment A for evidence, instrumentalities, contraband/ fruits of these crimes further described in Attachment B.

### **STATUTORY AUTHORITY**

7. This investigation concerns alleged violations of Title 18 U.S.C. §§ 2252 and 2252A, relating to material involving the sexual exploitation of minors, which has been defined in Title 18 U.S.C. § 2256, as an individual under 18 years of age.

a. Under Title 18 U.S.C. §§ 2252(a)(1) (transportation), 2252(a)(2) (receipt and distribution), and 2252(a)(4)(B) and 2252A(a)(5)(B) (possession), it is a federal crime for any person to transport, distribute, receive, and possess child pornography, as that term is defined by federal law. Further under Title 18 U.S.C. § 2253(a)(3), a person who is convicted of an offense under Title 18 U.S.C. § 2252 or 2252A, shall forfeit to the United States such person’s interest in any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

### **PROBABLE CAUSE**

8. On March 11, 2019, your Affiant received Cyber Tip Line Report Number 46956867 from the National Center for Missing and Exploited Children (NCMEC) in reference to media files containing what was believed to be child pornography being uploaded onto the Google Photos infrastructure.

9. The information on the suspected media containing child pornography was submitted to the Cyber Tip Line by Google on February 21, 2019. The incident information was categorized as being "Apparent Child Pornography" which was identified by Google representatives on all uploaded images and videos. A total of approximately twenty-two (22) uploaded files of suspected child pornography were linked to the reports. Twenty-two of said image files were identified as "viewed" by Google representatives prior to submission.

10. Google provided the Cyber Tip Line 46956867 with the following information of the user being reported:

Incident Type: Child Pornography (possession, manufacture, and distribution)

Name/User: Hippie Happy

Phone: 4795956402

Email Address: 420hippie8@gmail.com

IP Address: 162.194.117.71, 2600:1700:6930:2460:5d9d: f341:df02:a36e  
2600:1702:3730:3e30:e46e:352c:1c16:ba6,  
2600:1702:3730:3e30:f85f:477d: d133:4b7b, and  
2600:1702:3730:3e30:49be:209d: 289b:6029

Number of Uploaded Files: 22

11. Your Affiant viewed the files linked to the Cyber Tip Line Report and determined them to be images of child pornography. On May 6, 2019, your Affiant again viewed and described two (2) of these files as follows:

(a) File Name: Screenshot\_20181016-122903.png

This image depicts what is believed to be a six (6) to eight (8) year old minor female laying on a bed with her legs spread and no clothing on; the face and genitals of the minor female are visible.

(b) File Name: Screenshot\_2015-08-05-22-54-12.png

This image depicts what is believed to be a six (6) to eight (8) year old minor female on her hands and knees facing away from the camera looking back at the camera. The minor is not wearing any clothing and her face and genitals are visible.

12. Your Affiant determined that the subscriber for the IP address, 2600:1700:6930:2460:5d9d:f341:df02:a36e 2600:1702:3730:3e30:e46e:352c:1c16:ba6, 2600:1702:3730:3e30:f85f:477d:d133:4b7b, and 600:1702:3730:3e30:49be:209d:289b:6029, is Breanna Yowell, who resides at 2641 Kantz Drive, Fayetteville, Arkansas.

13. Further, your Affiant's investigation, using open source intelligence techniques, determined that the email address, 420hippie8@gmail.com belongs to Phillip Shoupe.

14. During the investigation, law enforcement was able to determine that the above described child pornography images were posted online from Fayetteville, Arkansas in the Western District of Arkansas.

#### **BACKGROUND REGARDING COMPUTERS AND THE INTERNET**

15. Your Affiant has become familiar with the Internet, which is a global network of computers and other electronic devices that communicate with each other using various means, including standard telephone lines, high-speed telecommunications links (e.g., copper and fiber optic cable), and wireless transmissions including satellite. Due to the structure of the Internet, connections between computers on the Internet routinely cross state and international borders, even when the computers communicating with each other are in the same state.

16. Individuals and entities use the Internet to gain access to a wide variety of information; to send information to, and receive information from, other individuals; to conduct

commercial transactions; and to communicate via electronic mail (“e-mail”) or Instant Messaging services (IM). An individual who wants to use the Internet must first obtain an account with a computer or cellular telephone that is linked to the Internet – for example, through a commercial service – which is called an “Internet Service Provider” or “ISP”. Once the individual has accessed the Internet, whether from a residence, a university, a place of business or via their cellular service provider, that individual can use Internet services, including sending and receiving e-mail and IM.

17. The Internet is a worldwide computer network that connects computers and facilitates the communication and the transfer of data and information across state and international boundaries. A user accesses the Internet from a computer network or Internet Service Provider (“ISP”) that connects to the Internet. The ISP assigns each user an Internet Protocol (“IP”) Address. Each IP address is unique. Every computer or device on the Internet is referenced by a unique IP address the same way every telephone has a unique telephone number. An IP address is a series of four numbers separated by a period, and each number is a whole number between 0 and 255. An example of an IP address is 12.345.678.901. Each time an individual accesses the Internet, the computer from which that individual initiates access is assigned an IP address. The ISP logs the date, time and duration of the Internet session for each IP address and can identify the user of that IP address for such a session from these records, depending on the ISP’s record retention policies.

18. Computers as well create a “Log File” that automatically records electronic events that occur on the computer. Computer programs can record a wide range of events including remote access, file transfers, long/logoff times, systems errors, Uniform Resource Locator



addresses (websites), unique searches performed on the Internet and various forms of electronic communications.

19. Computer files or remnants of such files can be recovered months or even years after they have been downloaded onto the hard drive, deleted, or viewed via the Internet. Electronic files downloaded to a hard drive can be stored for years at little or no cost. Even when such files have been deleted, they may be recoverable months or years later using readily-available forensic tools. When a person “deletes” a file on a home computer, the data contained in the file does not actually disappear; rather, that data remains on the hard drive until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space – that is, in space on the hard drive that is not allocated to an active file or that is unused after a file has been allocated to a set block of storage space – for long periods of time before they are overwritten.

20. Similarly, files that have been viewed via the Internet are automatically downloaded into a temporary Internet directory or cache. The browser typically maintains a fixed amount of hard drive space devoted to these files, and the files are only overwritten as they are replaced with more recently viewed Internet pages. Thus, the ability to retrieve residue of an electronic file from a hard drive depends less on when the file was downloaded or viewed than on a particular user’s operating system, storage capacity, and computer habits.

21. The use of the Internet and more specifically electronic communications via the Internet provides individuals the ability to mask their true identities as well as their physical locations. Additionally, the use of the Internet provides individuals and their associates the ability to access social networking sites free of charge to further their criminal activity

#### **BACKGROUND CONCERNING GOOGLE DRIVE**



22. “Social networking” or “social network service” is a term used to describe applications or websites which focus on establishing networks or relationships among individual users based on interests or activities. These services typically consist of a personal online representation of an individual, often referred to as a profile, a list of other individuals with which a person has shared interests and has allowed to view their profile, and a variety of other capabilities, such as the uploading and sharing of images and videos. Newer capabilities allow access to the social networks via mobile devices such as cellular telephones and the upload of real-time information to an individual’s profile. Most, if not all, of the social networks and photo sharing websites are accessible via the Internet and allow a member to contact other members via electronic mail (e-mail), instant messaging, or comments placed directly to a member’s profile. Normally, information posted by individuals to their own or another individual’s profiles are not vetted for accuracy or content.

23. Google Plus ([plus.google.com](http://plus.google.com), hereinafter “Google+”) is an interactive, online, social networking site founded in 2011 with corporate offices located in Mountain View, California. As of June 2013, Google+ has over 500 million registered members.

24. Membership on Google+ is free to anyone. To create an account, an individual must have a Google account, either a Google email address or Google Apps<sup>1</sup> account. The individual must first login with their Google e-mail address and account password. He/she will then

---

<sup>1</sup> Google Apps is a service from Google providing independently customizable versions of several Google products under a custom domain name.

provide first and last name, sex, and date of birth. Once this information is submitted three optional steps are provided by Google+: 1) import friends from an existing e-mail account; 2) follow interesting people and pages (ie. Food & Drink, Lifestyle, Technology.) ; and 3) upload an image to the newly created profile to serve as the account's profile picture and complete basic profile information such as location, employer, and educational institutions. Once these steps are completed or by-passed, the profile page for the new account is available. A "welcome" email from Google will then be sent to the email account provided to Google during the registration process. Content located on an individual's Google+ profile is determined by the member, with options to include a profile picture, short introduction and other biographical details. A Google+ member can also upload an unlimited number of photos and videos, and manage those images in albums. "Circles" can be created by members that allow them to decide what types of information any person can see within that member's profile. "Circles" are an essential part of Google+. They let members group people together into categories based on relationship type (ie. Best friends, Work, Fitness, etc...). "Suggestions" is a feature where names of other possibly familiar Google+ members are provided to potentially add to circles. Google+ members can customize profile information by circles. Once a person is a part of a member's circle, additional information on that member's profile may become visible based on the privacy settings for that

particular account.

25. Google+ also allows members to create “communities” that have common interests, but are not necessarily a particular person in their circle. Google+ users can create public or private “communities” and share content and posts with other members within that particular community. A member can create one of four types of communities: 1) Public - which allows everyone to join. Community information and content is viewable by all members and can be indexed by search engines; 2) Public with moderator approval - which requires the moderator of the Community to approve new membership requests, and where the community’s content is shared publicly, but limited to who can create content; 3) Private with moderator approval- which allows people to find through a search and request to join, and where membership approval is provided by the moderator and information and content is only viewable by members; and 4) Private – hidden from searches, information and content is only viewable by members, and membership is by invitation only.

26. “Photo-Sharing service” or “photo-sharing website” is a service that allows the publishing or transfer of a user’s digital photo online, thus enabling the user to share them with others, publicly and/or privately. The function is provided through both websites and applications that facilitate the upload and display of images.

27. Picasa is an image organizer and image viewer for organizing and editing digital photos, plus an integrated photo-sharing website, owned by Google.

#### **BACKGROUND CONCERNING E-MAIL**



28. In my training and experience, I have learned that Google, Inc. provides a variety of on-line services, including electronic mail ("e-mail") access, to the public. Google, Inc. allows subscribers to obtain e-mail accounts at the domain name gmail.com, like the e-mail account listed in Attachment A. Subscribers obtain an account by registering with Google, Inc. During the registration process, Google, Inc. asks subscribers to provide basic personal information. Therefore, the computers of Google, Inc. are likely to contain stored electronic communications (including retrieved and un-retrieved e-mail for subscribers) and information concerning Google, Inc. subscribers and their use of Google, Inc. services, such as account access information, e-mail transaction information, and account application information. In my training and experience, such information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users.

29. A Google, Inc. subscriber can also store, with the provider, files in addition to e-mails, such as address books, contact or buddy lists, calendar data, pictures (other than ones attached to e-mails), and other files, on servers maintained and/or owned by Google, Inc. In my training and experience, evidence of who was using an e-mail account may be found in address books, contact or buddy lists, e-mails in the account, and attachments to e-mails, including pictures and files.

30. In my training and experience, e-mail providers generally ask their subscribers to provide certain personal identifying information when registering for an e-mail account. Such information can include the subscriber's full name, physical address, telephone numbers and other identifiers, alternative e-mail addresses, and, for paying subscribers, means and source of payment (including any credit or bank account number). In my training and experience, such information may constitute evidence of the crimes

under investigation because the information can be used to identify the account's user or users.

31. In my training and experience, e-mail providers typically retain certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e., session) times and durations, the types of services utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account (such as logging into the account via the provider's website), and other log files that reflect usage of the account. In addition, e-mail providers often have records of the Internet Protocol address ("IP address") used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the e-mail account.

32. In my training and experience, in some cases, e-mail account users will communicate directly with an e-mail service provider about issues relating to the account, such as technical problems, billing inquiries, or complaints from other users. E-mail providers typically retain records about such communications, including records of contacts between the user and the provider's support services, as well records of any actions taken by the provider or user as a result of the communications. In my training and experience, such information may constitute evidence of the crimes under investigation because the information can be used to identify the account's user or users.

**CHARACTERISTICS COMMON TO INDIVIDUALS WHO  
COMMUNICATE ONLINE & CONSPIRE TO ADVERTISE,  
DISTRIBUTE & COLLECT CHILD PORNOGRAPHY**

33. Based on my investigative experience related to child pornography investigations, and the training and experience of other law enforcement officers with whom I have had discussions, I know there are certain characteristics common to individuals who utilize internet forums to communicate and conspire with others to advertise, distribute, receive and collect images and videos of child pornography:

- a. Individuals who conspire with others to advertise, distribute and collect child pornography may receive sexual gratification, stimulation, and satisfaction from contact with children; or from fantasies they may have viewing children engaged in sexual activity or in sexually suggestive poses, whether in person, in photographs, or other visual media; or from literature describing such activity.
- b. Individuals who conspire with others to advertise, distribute and collect child pornography may collect sexually explicit or suggestive materials, in a variety of media, including photographs, magazines, motion pictures, videotapes, books, slides and/or drawings or other visual media. Individuals who have a sexual interest in children or images of children oftentimes use these materials for their own sexual arousal and gratification. Further, they may use these materials to lower the inhibitions of children they are attempting to seduce, to arouse the selected child partner, or to demonstrate the desired sexual acts.
- c. Individuals who conspire with others to advertise, distribute and collect child pornography have been known to possess and maintain their "hard copies" of child pornographic material, that is, their pictures, films, video tapes, magazines, negatives, photographs, correspondence, mailing lists, books, tape recordings, etc., in the privacy and security of their home or some other secure location. Individuals who have a sexual interest in children or images of children typically retain pictures, films, photographs, negatives, magazines, correspondence, books, tape recordings, mailing lists, child erotica, and videotapes for many years.
- d. Likewise, individuals who conspire with others to advertise, distribute and collect child pornography often maintain their collections that are in a digital or electronic format in a safe, secure and private environment, such as a computer and surrounding area. These collections are often maintained for several years and are kept close by, usually at the collector's residence, to enable the individual to view the collection, which is valued highly.



e. Individuals who conspire with others to advertise, distribute and view child pornography correspond with and/or meet others to share information and materials rarely destroy correspondence from other child pornography distributors/collectors; conceal such correspondence as they do their sexually explicit material; and often maintain lists of names, addresses, and telephone numbers of individuals with whom they have been in contact and who share the same interests in child pornography.

f. Individuals who would email others child pornography would have had to meet those individuals in other online forums designed to attract those interested in child pornography. These individuals gain knowledge each other's email addresses through online communication with others of similar interest on forums. Other forums, such as social networking sites, photo-sharing sites, bulletin boards, newsgroups, IRC chat or chat rooms have areas dedicated to the trafficking of child pornography images. Individuals who utilize these types of forums are considered more advanced users and therefore more experienced in acquiring a collection of child pornography.

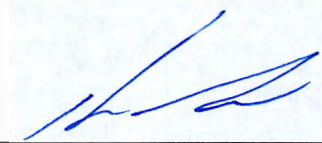
g. Individuals who conspire with others to advertise, distribute and collect child pornography prefer not to be without their child pornography for any prolonged time period. This behavior has been documented by law enforcement officers involved in the investigation of child pornography throughout the world. Users will maintain their collections both off and online.

h. Individuals who conspire with others to advertise, distribute and collect child pornography often utilize the same online account(s), such as an e-mail account, for an extended period of time to collect and distribute child pornography material. One of the reasons for this is to establish the account(s) as being known to other collectors and distributors of child pornography to foster the individual's ability to obtain child pornography material. Similar investigations involving the distribution of child pornography materials via e-mail have routinely identified individuals who have utilized the same e-mail account(s) for an extended period of time; many times over a multiple-year period.

i. Based on my knowledge, training, and experience in child exploitation and child pornography investigations, and the experience and training of other law enforcement officers with whom I have had discussions, collectors and distributors of child pornography often establish online accounts, such as e-mail accounts, that are distinct from accounts associated with their true identities. One of the reasons for this is to conceal their true identities from law enforcement.

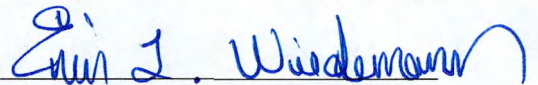
**CONCLUSION**

34. Therefore, your affiant respectfully requests this Court to issue a search warrant authorizing the search of Google Drive account: 420hippie8@gmail.com, which is controlled and maintained by Google, Inc., as described in Attachment A, to seize the evidence, fruits, and instrumentalities described in Attachment B, which individually or collectively constitute the crimes, Receipt or Possession of Child Pornography, in violation of Title 18 U.S.C. § 2252A, and Access with Intent to View Child Pornography, in violation of Title 18 U.S.C. § 2252A (a)(5)(B).



TFO Kevin Sears  
Homeland Security Investigations

Affidavit subscribed and sworn to before me this 4th day of June 2019.



Erin L. Wiedemann  
United States Magistrate Judge

**ATTACHMENT A**

**PROPERTY TO BE SEARCHED**

This search warrant applies to all content and information, deleted or otherwise, contained in or associated with the Google Drive account: 420hippie8@gmail.com that is stored at premises controlled by Google, Inc., a company that accepts service of legal process at its headquarters, located at 1600 Amphitheatre Parkway, Mountain View, California 74043.



## **ATTACHMENT B**

### **I. Information to be disclosed by Google, Inc. (the "Provider")**

Any e-mails, records, files, logs, or information that has been deleted from Provider accounts, 420hippie8@gmail.com , but is still available to the Provider; or that has been preserved in that Provider account pursuant to a request made under 18 U.S.C. §2703(f) on April 9, 2019. The Provider must disclose to the government the following content or information contained in Google G-Mail accounts420hippie8@gmail.com :

- a. All e-mails, including stored or preserved copies of e-mails sent to and from the account, draft e-mails, the source and destination addresses associated with each e-mail, the date and time at which each e-mail was sent or received, and the size and length of each e-mail;
- b. All documents containing information that: identifies the account, or account holder, to include full name, physical address, telephone numbers, and other identifiers; reveals session times and duration; establishes the date on which the account was created, and the IP address used to register the account; establishes log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);
- c. The types of service utilized;
- d. All records or other information stored at any time by an individual using the account, including address books, contact and buddy lists, calendar data, pictures, and files;

- e. All records pertaining to communications between the Provider and any person regarding the account, including contacts with support services and records of actions taken.
- f. Any and all images of children engaged in sexually explicit conduct, including those posed in lascivious manners.
- g. Any and all images of pornography, more specifically including any images of individuals engaged in sexual activity.

## **II. Information to be seized by the government**

The government is authorized to seize only information described in Section I that constitutes fruits, contraband, evidence and instrumentalities of violations of Title 18, United States Code, Sections; 2251(a) [Production of Child Pornography]; 2252(a)(4)(B) [Possession of Child Pornography]; 2422(b) [Enticement of a Minor]; 2422(a) [Coercion] and 2423(a) [Transportation with intent to engage in criminal sexual activity], including information pertaining to the following matters:

- a. Email communications between 420hippie8@gmail.com, as well as any secondary accounts, and other e-mail users, known or unknown, where child pornography is traded and/or discussed.
- b. The identity and whereabouts of those persons who created, used, or communicated with the Google G-Mail account identified in Attachment A.

## **III. Means of Production**

Google, Inc. shall disclose responsive data, if any, by sending to Homeland Security Investigations, C/O: Special Agent William DeVito at 3419 North Plainview Avenue, Fayetteville, Arkansas 72703 via U.S. Postal Service or another courier service, notwithstanding Title 18 U.S.C. 2252A or similar statute or code.